



IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

Filed Under Seal

UNITED STATES OF AMERICA

Case No. 1:23-CR-180

v.

Counts 1 - 5: 18 U.S.C. § 2251(a) and (e)
Sexual Exploitation of Children

RAYMOND LEE CHAVEZ

Count 6: 18 U.S.C. § 2252(a)(2) and (b)(1)
Receipt of Child Pornography

Defendant.

Count 7: 18 U.S.C. § 2252(a)(4)(B) and (b)
(2) Possession of Child Pornography

Forfeiture Notice: 18 U.S.C. § 2253(a)

INDICTMENT

November 2023 Term—at Alexandria, Virginia

COUNT ONE
(Sexual Exploitation of Children)

THE GRAND JURY CHARGES THAT:

Between on or about September 9, 2016 and on or about March 1, 2023, in Loudoun County, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, RAYMOND LEE CHAVEZ, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, Minor 1, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct. Such visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, U.S. Code, Section 2251(a) and (e).)

COUNT TWO
(Sexual Exploitation of Children)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about October 7, 2017 and on or about March 1, 2023, in Loudoun County, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, RAYMOND LEE CHAVEZ, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, Minor 2, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct. Such visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, U.S. Code, Section 2251(a) and (e).)

COUNT THREE
(Sexual Exploitation of Children)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about April 16, 2018 and on or about March 1, 2023, in Loudoun County, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, RAYMOND LEE CHAVEZ, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, Minor 3, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct. Such visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, U.S. Code, Section 2251(a) and (e).)

COUNT FOUR
(Sexual Exploitation of Children)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about April 16, 2018 and on or about March 1, 2023, in Loudoun County, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, RAYMOND LEE CHAVEZ, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, Minor 4, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct. Such visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, U.S. Code, Section 2251(a) and (e).)

COUNT FIVE
(Sexual Exploitation of Children)

THE GRAND JURY FURTHER CHARGES THAT:

Between on or about July 6, 2017 and on or about March 1, 2023, in Loudoun County, Virginia, within the Eastern District of Virginia and elsewhere, the defendant, RAYMOND LEE CHAVEZ, did attempt to and did employ, use, persuade, induce, entice, and coerce a minor, Minor 5, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct. Such visual depiction had actually been transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(All in violation of Title 18, U.S. Code, Section 2251(a) and (e).)

COUNT SIX
(Receipt of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

From at least April 2017 through at least November 2022, in Loudoun County, Virginia, within the Eastern District of Virginia, the defendant, RAYMOND LEE CHAVEZ, did knowingly receive and attempt to receive a visual depiction using any means and facility of interstate and foreign commerce, and which visual depiction had been transported in and affecting interstate and foreign commerce, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct.

(All in violation of Title 18, U.S. Code, Section 2252(a)(2) and (b)(1).)

COUNT SEVEN
(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 1, 2023, in Loudoun County, Virginia, within the Eastern District of Virginia, the defendant, RAYMOND LEE CHAVEZ, did knowingly possess and attempt to possess at least one matter containing a visual depiction that had been transported using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce, and which visual depiction was produced using materials which had been mailed and so shipped and transported, by any means including by computer; and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and such visual depiction was of such conduct, to wit: sexually explicit videos and images of minors stored on an Apple MacBook Air laptop (SN C02WMN3FJ1WK), a MacBook Pro laptop (SN C02CV3DAMLJ7), an Omega external hard drive (SN T9AK26AAHX), a G Drive 1 TB external hard drive (SN 7106KV5P), an Apple MacBook Pro laptop (SN C2QDV033DD6Y), and a G Drive 2 TB external hard drive (SN WXW1A78FL7JS).

It is further alleged that at least one visual depiction involved in the offense involved a prepubescent minor and a minor who had not attained 12 years of age engaging in sexually explicit conduct.

(All in violation of Title 18, U.S. Code, Section 2252(a)(4)(B) and (b)(2).)

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS THAT:

The defendant, RAYMOND LEE CHAVEZ, is hereby notified, pursuant to Federal Rule of Criminal Procedure 32.2(a), that upon conviction on any Count of this Indictment, he shall forfeit to the United States: (1) any visual depiction described in 18 U.S.C. §§ 2251, 2251A, 2252, 2252A, 2252B, or 2260, and any matter that contains any such visual depiction, which was produced, transported, mailed, shipped, and received in violation of this chapter; (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (3) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense, and any property traceable to such property. This property includes, but is not limited to:

- 1) Apple MacBook Air w/ 500GB Toshiba Hard Drive (SN C02WMN3FJ1WK)
- 2) MacBook Pro w/ 1TB Hard Drive (SN C02CV3DAMLJ7)
- 3) Omega 320gb external hard drive (SN T9AK26AAHX)
- 4) G Drive 1 TB external hard drive (SN 7106KV5P)
- 5) Apple MacBook Pro A1297 (SN C2QDV033DD6Y)
- 6) G Drive 2 TB external hard drive (SN WXW1A78FL7JS)
- 7) Apple Power Book G4 laptop (SN NT61T8232A1A)

(Continued on next page.)

If any property subject to forfeiture is unavailable, the United States may seek an order forfeiting substitute assets pursuant to Title 21, U.S. Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e).

(All in accordance with Title 18, United States Code, Section 2253;
Title 21, United States Code, Section 853(p); and Fed. R. Crim. P. 32.2.)

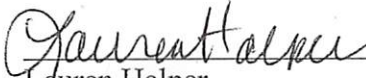
JESSICA D. ABER
United States Attorney

A TRUE BILL

FOREPERSON

*Per the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office.*

By:


Lauren Halper
Assistant United States Attorney
